

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Broadcast Localism)	MB Docket No. 04-233
)	
)	

To: Office of the Secretary
Attn: The Commission

COMMENTS

Craig J. Eckert Executive Vice President of Platte River Radio Inc. the licensee of KKPR/KXPB Kearney, Nebraska and KHAS/KLIQ/KICS in Hastings, Nebraska, pursuant to *Report on Broadcast Localism and Notice of Proposed Rulemaking*, FCC 08-218, MB Docket No. 04-233, released January 24, 2008, hereby submits its comments in this proceeding regarding the FCC's several proposed rule changes designed to enhance broadcast localism and diversity, to increase and improve the amount and nature of broadcast programming that is targeted to the local needs and interests of a broadcast station's community of service, and to provide more accessible information to the public about broadcasters' efforts to air such programming.¹

The notice of proposed rulemaking is rife with many a false premise. I do not agree that local communities and constituencies are underserved by free radio. The latest

¹ By *Public Notice*, DA 08-515, released March 6, 2008, time for filing comments in this proceeding was extended to April 28, 2008. Accordingly, these comments are timely filed.

research in markets using people meters confirm that free radio listening is up. The average person in those measurements actually listened to numerically more different stations than previous methods showed. That information can lead to no other conclusion than; people know they can tune to a variety of free radio stations depending on their needs. The Commission should along with the free radio industry take pride in that public recognition.

As a small broadcaster with total revenues under 1.7 million per year spread over 5 stations employing 24 full time people, simple arithmetic will prove that we are hardly in excess profits territory. I compete with one large broadcasting company in particular, who when faced with government reporting submit to a main office hundreds of miles away and the work is done by a specific department, however in the case of my company it rests with me and my Business Manager who is spending more and more time with EEO alone, and please keep in mind it is not just the reporting but assuring actual compliance takes even more time. Financially just to make sure this is done correctly my yearly Washington DC attorney fees have doubled. Last year our EEO files were audited (and were found in compliance) but not before the legal bills doubled again for 2007. I cannot afford more specialists in the area of compliance so more such reporting requirements may force cuts in other areas thereby potentially defeating what I assume is your intent of adding local programming services. That added newsperson or a public affairs director just dropped out of my budget if I am forced to hire more clerical help.

In the matter of local station advisory boards from the public, aside from the initial problem that members of the public are unwilling to serve even on United Way, Red Cross and other vital local boards, the prospect of quality community advisory boards is not very good. As an owner/manager I spend more than half my time out on the streets of our communities and on committees in the communities that we serve; I hear more honest feedback in a week about what needs to be done and broadcast than a quarter year of advisory boards will ever tell me. If I misread the needs of my communities then my advertisers go elsewhere as do my listeners and I eliminate myself without government intervention.

As far as remote station operation, I say with technology today we are 20 seconds away (if need be) of putting emergency news or weather information live on air day or night. Since 1972 my first year in broadcasting, I've seen in person or heard of all manner of human attendants abuse attention to their job, sleeping on couches ignoring Associated Press alarms (see the 1971 case of KQRS-FM in Minneapolis ignoring a false alarm nuclear attack because the announcer on duty just didn't check the wire machine. In 1972 the staff didn't have wire machines in their homes;

today I have Internet-mail, NOAA weather, cell phones, land lines Associated Press everything at my fingertips and so does my staff. By comparison a minimum wage overnight attendant to fulfill a make work position is laughable as it diverts productive budget expenditures.

In the matter of shortening license terms, increasing reports on percentage or various types of programs; these are antiquated ideas that correctly met their demise with the advent of thousands of new radio stations over the past three decades. Needless to say the cost increase and its ensuing impact on service is the same if not more than stated previously.

In summary the current state of broadcasting based on local support though local service is no different than any business in the United States; you can't "micro-manage" a bad broadcaster into being a good broadcaster, but you can "micro-manage" a good broadcaster out of business.

Respectfully submitted,

By _____

Craig J. Eckert
Executive Vice President
Platte River Radio Inc.
403 East 25th
Kearney, NE 68847
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